

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE

IN THE MATTER OF THE SEARCH OF  
INFORMATION ASSOCIATED WITH THE  
KIK USERNAMES:

“sebasRPMopen”, Et Al.

THAT IS STORED AT PREMISES  
CONTROLLED BY MEDIALAB.AI INC.

**Case No. 2:25-mj-00085-KFW**

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A SEARCH WARRANT**

I, Joshua King, being duly sworn under oath, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Task Force Officer (TFO) for the Homeland Security Investigations (HSI) within the United States Department of Homeland Security (DHS) and have been so assigned since November of 2024. I am employed by the Lewiston Police Department (LPD) but assigned as a full-time TFO to HSI. HSI is the primary investigative arm of DHS. I am currently assigned to the Resident Agent (RA) office in Portland, Maine.

2. Prior to my assignment with HSI, I have been a sworn Maine law enforcement officer for 17 years, and during my law enforcement career, I have held ranks of Detective, and Detective Sergeant. I attended the Basic Law Enforcement training program and graduated in May 2007. Since then, I have worked as a police officer at Wilton Police Department, Madison Police Department, Skowhegan Police Department, Auburn Police Department, and Lewiston Police Department. Prior to my present position as a TFO, I have investigated sex crimes, including crimes against

children, online exploitation of children, drugs, and violent crimes. I have attended many trainings throughout my career, including but limited to Cellebrite forensic examiner certification and Digital Evidence for Investigators hosted at the National Computer Forensic Institute (Hoover, Alabama). I have forensically extracted data from over 50 cell phones during the course of career after obtaining my certification under Cellebrite. I was previously a forensic examiner using the software Latern. Prior to my present position as a TFO, as a local police officer, I have applied for and obtained over 100 search warrants for electronic service providers, including Google and social media companies. I am currently an affiliate investigator with the Maine Internet Crimes Against Children (ICAC) Task Force. Prior to this designation, I assisted with ICAC investigations in Skowhewgan, Maine, which included applying for and assisting with the execution of search warrants. My training has provided me the knowledge to readily recognize aspects of exploitation involving children. The agents and police officers involved in this investigation, including myself, are familiar with the methods, practices, and operations involved in the victimization of children including the use of various social media websites (Facebook, Twitter, Kik, Snapchat, Discord, etc.), “cloud” based storage, and peer-to-peer (P2P) networks.

3. In September 2024, I graduated from the HSI Task Force Officer training course. I have conducted past undercover (UC) operations including social media messaging applications. My past operations have resulted in arrests and convictions of offenders.

4. As a TFO, I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and I am empowered by law to conduct investigations and to execute warrants issued under the

authority of the United States, including 18 U.S.C. §§ 1470 and 2252A(a)(2). I am also a federal law enforcement officer with the meaning of Rule 41 of the Federal Rules of Criminal Procedure.

**SUMMARY OF WARRANT REQUEST**

5. I make this Affidavit in support of an application for a search warrant for information associated with multiple Kik accounts that are stored at premises owned, maintained, controlled, or operated by MediaLab.ai Inc., a company based in the United States in California, which accepts legal process at their online law enforcement portal. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require MediaLab.ai Inc. to disclose to the government records and other information in its possession pertaining to the subscriber(s) or customer(s) from the date of account creation until present date of the issuance of the search warrant associated with the following accounts:

- (1) A Kik account identified by the following:  
Display Name: *sebasRPMopen*  
Username: *sebasrpmopen*
- (2) A Kik account identified by the following:  
Display Name: *ReedSebs*  
Username: *ReedSebs*
- (3) A Kik account identified by the following and associated with Cybertip #196293220:  
Username: *Sebsopen*  
ESP ID: *Sebsopen\_jgo*
- (4) A Kik account identified by the following and associated with Cybertip #198010036:  
Username: *sbtnrds*  
ESP ID: *sbtnrds\_8na*

- (5) A Kik account identified by the following and associated with Cybertip #202938221:  
Username: *sebastianreeed*  
ESP ID: *sebastianreeed\_kvh*
- (6) A Kik account identified by the following and associated with Cybertip #204860256:  
Username: *sebsnew*  
ESP ID: *sebsnew\_ezu*
- (7) A Kik account identified by the following and associated with Cybertips #201634134 and #206164152:  
Username: *sebsreeds*  
ESP ID: *sebsreeds\_ycg*
- (8) A Kik account identified by the following and associated with Cybertip #196930488:  
Username: *sebastianrds*  
ESP ID: *sebastianrds\_x4i*
- (9) A Kik account identified by the following and associated with Cybertip #198581053:  
Username: *sebsopen4*  
ESP ID: *sebsopen4\_p4k*
- (10) A Kik account identified by the following and associated with Cybertip #202044199:  
Username: *sebsrreed*  
ESP ID: *sebsrreed\_iid*
- (11) A Kik account identified by the following and associated with Cybertip #203429579:  
Username: *sebropen*  
ESP ID: *sebropen\_7tv*
- (12) A Kik account identified by the following and associated with Cybertips #205408062 and #205408062:  
Username: *sebrpmopen*  
ESP ID: *sebrpmopen\_c7v*
- (13) A Kik account identified by the following and associated with Cybertip #206801241:  
Username: *reedsebs*
- (14) A Kik account identified by the following and associated with Cybertip #203856877:  
Username: *sebsropen*

ESP ID: *sebsropen\_vck*

- (15) A Kik account identified by the following and associated with  
Cybertip #197547371:

Username: *sbtnreed*

ESP ID: *sbtnreed\_z6u*

- (16) A Kik account identified by the following and associated with  
Cybertip #202509221:

Username: *sebsjreed*

ESP ID: *sebsjreed\_95c*

- (17) A Kik account identified by the following and associated with  
Cybertip #204332537:

Username: *sebropenpm*

ESP ID: *sebropenpm\_xfr*

- (18) A Kik account identified by the following and associated with  
Cybertip #205937963:

Username: *sebsrpmopen*

ESP ID: *sebsrpmopen\_jku*

- (19) A Kik account identified by the following and associated with  
Cybertip #206337627:

Username: *sebasrpmopen*

ESP ID: *sebasrpmopen\_ooz*

- (20) A Kik account identified by the following:

Username: *SReed1214*

Display Name: *SReed1214*

The twenty above-described accounts shall herein also be referred to as the **Target Accounts**.

6. The statements set forth in this Affidavit are based on: my own personal knowledge and observations; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; review of documents and records related to this investigation; communications with others who



have personal knowledge of the events and circumstances described herein; and the experience and training of other law enforcement officers with whom I have had discussions. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation.

7. Based on my training, experience and participation in the investigation described below, and the facts set forth in this affidavit, I submit that there is probable cause to believe that violations of 18 U.S.C. §§ 1470, and 2252A(a)(2) have been committed. I further submit that evidence, fruits, and instrumentalities of such criminal violations are likely to be found within the **Target Accounts** and the location to be searched as described in Attachment A.

#### **PERTINENT CRIMINAL STATUTES**

8. Title 18, United States Code, Section 2252A(a)(2) makes it a crime to knowingly receive or distribute any child pornography using any means or facility of interstate or foreign commerce, or that has been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

9. The term “child pornography” is defined in 18 U.S.C. § 2256(8). “Child pornography,” as defined in 18 U.S.C. § 2256(8), includes: any visual depiction of a child under the age of 18 years engaging in sexually explicit conduct. “Sexually explicit conduct” is defined in 18 U.S.C. § 2256(2) and includes sexual intercourse, whether genital-genital, oral-genital, anal-genital, or oral-anal, whether between members of the same or opposite sex; bestiality; masturbation; sadistic or masochistic abuse; and the lascivious exhibition of the genitals, anus, or pubic area of any person. For investigative purposes, child pornography is commonly referred to as child sexual abuse material or

CSAM. For purpose of this affidavit, the terms CSAM and child pornography will be used interchangeably.

10. Title 18, United States Code, Section 1470 makes it a crime to knowingly transfer obscene matter to a minor under the age of 16 years by using the mail or any facility or means of interstate or foreign commerce.

### **STATEMENT OF PROBABLE CAUSE**

11. In February 2025, Homeland Security Investigations – Portland, ME RAC initiated an undercover (UC) operation to target individuals victimize children online to engage in child exploitation activities. This involved the social media platform known as Kik Messenger or Kik, which is operated by the parent electronic communication service provider, MediaLab.ai Inc. (herein also referred to as “MediaLab.ai” or “MediaLab”). On February 14<sup>th</sup>, 2025, while engaged as a UC on the Kik social media platform, I entered Middle School and High School chatrooms, among others. My UC Kik account profile picture was an AI-generated image of a young girl in a dress. While online in my UC capacity, I received a private message from another Kik account with a username, and a display name of “sebasRPMopen”. The opening exchange between “sebasRPMopen” and UC is included below.

SebasRPMopen	Hey Hun ... I saw you in the Middle School Room...
	I hope you don't mind me messaging and asking...
	Would you like to chat? Xx
	Happy Valentine's Day Babe (Smile Emoji) (Rose) (Rose) (Rose)
UC	Sure asl?
SebasRPMopen	<Image in White Suite with Tall Male>
	That's me wearing the white... I'm 42 m and from NY and SA...
	Would you be offended if I asked you if I could maybe see a picture of you too? (Kissing Emoji)
UC	13 f maine
	<AI Makeup Picture>
	Fave picture from my sister's wedding



SebasRPMopen	Tbh age doesn't matter to me... I judge people by who they are and not by a number...
	Do you mind chatting to older people? I don't want to offend or upset you babe x.x
	Young lady you are really beautiful (heart eye emoji) (rose) (rose)
UC	Aw thanks
	No we can talk

12. “sebasRPMopen” began engaging me, the purported minor in a manner which was an apparent attempt to groom me. Specifically, he sent me sexualized describing his “kink”, asking about me “being secretly naughty”, and asking about my family. He initiated these sexual conversations. “sebasRPMopen” also disclosed he had previously dated, and had sex with a 15-year-old female, and provided me with his assumed name “Sebastian”. Some of the chats demonstrating this behavior are below.

SebasRPMopen	Do your parents not mind you chatting on here? Or are you being secretly naughty and they don't know? HeeHee
UC	Lol mostly the second half
SebasRPMopen	Just chilling on the couch chatting to you...
UC	Cool
SebasRPMopen	lol you are so my kinda girl lol
UC	U chatted up or been with younger girls before?
SebasRPMopen	Being secretly naughty, adventurous and pushing limits is kinda my biggest kink...
UC	Lol
SebasRPMopen	Mmm not on here but age like I said age doesn't matter to me...
	But can I tell you something about me?
UC	Sure
SebasRPMopen	So you know how you said that you don't like how immature the guys your age are?
UC	Yeah I'm the oldest
SebasRPMopen	So I get on way between with younger girls because I find girls my age soooo boring (monkey covering eyes emoji) (monkey covering eyes emoji)
	Sorry is that bad? (monkey covering eyes emoji)
UC	Lol
	Nah
	What's the youngest u dated
SebasRPMopen	Have you ever kissed a guy?



UC	Yeah
SebasRPMopen	Mmm promise me you won't judge me?
UC	Of course
SebasRPMopen	I was with a girl who was 2 years older than you
	Babe what's your name?
UC	Bri
	That's not bad, u guys date and do stuff or just chatting
SebasRPMopen	Bri I'm Sebastian... I think you are a really awesome person I'm so glad I met you (kissing emoji) (lip emoji)
UC	Me too
SebasRPMopen	We dated irl and did stuff
UC	That's cool
	Were u her first? That's kind of romantic
SebasRPMopen	Babe I believe that people are be as secretly naughty as they want with almost no limits as long as it's consensual...
	I don't know if you agree?
UC	Yeah I think so
SebasRPMopen	lol are you asking me if we had sex? Heehee
UC	Kind of lol
SebasRPMopen	Babe you can be totally open and honest with me I promise you that all we talk about and share will stay between us (kissing emoji)
UC	OK me too
SebasRPMopen	You are awesome thank you babe xx
	Yes we did have sex and I was her first
UC	Cool
SebasRPMopen	What's the naughtiest thing you've ever done with a guy irl?
UC	I've done everything but sex
SebasRPMopen	You are so my kinda naughty (kissing emoji)
	What's the oldest guy you have ever been with?
UC	Haha 17
	He was graduating high school and moved away
SebasRPMopen	Mmm you are so sexy xx
	I have a confession...
UC	Tell me
	Can I see ur ex? U have a picture?
SebasRPMopen	If I met you irl I would definitely ask you if you'd like to have dinner with me? I think you are really awesome and out of this world gorgeous and sexy (kissing emoji)



13. In response to my request for a picture of his ex-girlfriend, “sebasRPMopen” responded he may have a few “naughty” ones of her and that he would look for them. He went on to explain that she (referring to the 15-year-old female) does not mind him giving them out to people he trusts. This is another example of grooming behavior, and establishing that if I sent him material, he claimed that he would not share it. He seemed to state this to engender trust, which was paradoxical, because he sent me material of an apparent minor female.

SebasRPMopen	Mmm I think I might have a few naughty ones of her yes... I can look for them and incase you are wondering she doesn't mind me sharing them with people who I trust.
	I asked her otherwise I would never share pictures of others behind their backs
	Sorry I believe in being open and honest... I really don't like people who lie and are dishonest (monkey covering eyes) (monkey covering eyes)
UC	Oh lol
	Me either
	Yeah I'd like to see any you have of her
SebasRPMopen	Mmm you just made my Valent'es Day Night by saying you would have dinner with me (kissing emoji) (heart) (heart)
	lol ok give me a second I'll find them for you (kissing emoji)
	Can I maybe see more pictures of you too beautiful? Sorry for asking but I think you are probably the most beautiful girl I've ever seen (heart eye emoji) (heart eye emoji)
UC	No Problem
	<AI Hoodie Selfie>
	<AI Back Hoodie Kitchen>
	<AI Shorts and Slippers>
SebasRPMopen	Ca567a26-00f5-4371-b25c-40f971bbe937.jpg
a	0b5728d0-4e65-4891-9597-4891-9597-413687004932.jpg
	307c9379-30c7-4da3-8516-6bf1217c6e1a.jpg
	C99bd16e-d65f-4ca7-ad0d-c121cb89a8dc.jpg
	0615b6df-a593-40ae-a102-ae-a102-a3e4cf5abd06.mp4
	Omg babe you are gorgeous (heart eye emoji) (heart eye emoji)
UC	Any of her face? I want to see if she's prettier than me haha I'm insecure
SebasRPMopen	Do you like vids?
UC	Sure
SebasRPMopen	Darling you have nothing to worry about...you leave me speechless (heart eye emoji) (heart eye emoji) how are you so beautiful? (heart eye emoji) (heart eye emoji)

	Babe what's your favorite food?
UC	8572481105 is my number Boston srea code used to live there
SebasRPMopen	Do you have telegram babe?
UC	Yea
	That's my cell tho
SebasRPMopen	Sebreed89
UC	U don't like my real number?
SebasRPMopen	Cool... thank you for trusting me enough to share it with me... I'll save it now babe and drop you a message
UC	Ok
SebasRPMopen	Have you ever given your number to anyone else you've met on kik?
UC	I have telegram same number
	No
SebasRPMopen	I'm glad... babe can I give you some advice?
	I think you are an amazing girl that's why I have to tell you this...
UC	What
SebasRPMopen	Please be careful who you give your number too on here because there are a lot of disrespectful mean and disgusting people on here...
UC	Oh yeah I don't usually I just didn't want to loose touch with u
SebasRPMopen	I feel the same way and thank you babe you are awesome
	(Heart)

14. The media files sent from “sebasRPMopen” to my UC account in the above-described segment of this chat thread can be further described as the following:

ca567a26-00f5-4371-b25c-40f971bbe937.jpg: an image of a pubescent female that appears to be in a gymnasium. The frame is almost all the face of the victim.

ob5728d0-4e65-4891-9597-4891-9597-413687004932.jpg: an image of a pubescent female which is covering her breasts with her left arm, and taking the image with her right. The victim is wearing a bracelet on her left arm which has black band, with beads. The victim's pubic area is visible, but not her genitals. She is seated in a bathtub with a few inches of water.

307c9379-30c7-4da3-8516-6bf1217c6e1a.jpg>: Depicts a female, who appears to be the same as in the first image taking a picture of herself with her breasts exposed. The female has the black band on her left arm and is holding a white iPhone in a black case. The camera on the iPhone appears to be an early generation of the device. The outlets appear to be North American, and outside the bathroom there appears to be circular designs.

c99bd16e-d65f-4ca7-ad0d-c121cb89a8dc.jpg: Depicts a female holding a black sweatshirt over her belly button, with her pants pulled down below her groin.



The victim is wearing blue underwear with a kitten head pattern, with stars. The background appears to show some white cabinets.

0615b6df-a593-40ae-a102-ae-a102-a3e4cf5abd06.mp4: is a 15 second video which depicts the female wearing a black sweatshirt, black band bracelet on her right wrist, with her hands underneath her underwear. The underwear has a kitten head pattern, with stars. The female has her pants pulled down to near her knees. The female appears to be masturbating, and she then puts her finger in her mouth. The background appears to show the female sitting on a carpet floor.

As noted, all the above-described image and videos files were identified by “sebasRPMopen” as depicting his previous fifteen-year-old girlfriend, so by definition constitute child sexual abuse material or child pornography. For purpose of this affidavit, because she is believed to be minor, that female will be also referred to as the “alleged victim.” By sending this imagery to my UC account, the suspect account committed the offense of Dissemination of Child Pornography.

15. As the chat progressed after sending me that imagery, “sebasRPMopen” went on to ask if I was “in a naughty mood” and then sent me pornographic videos and asked about my sexual experience.

SebasRPMopen	People would so think that you are my daughter... heehee
	Are you in a naughty mood?
UC	Dunno depends on what for I guess
	U didn't text me
SebasRPMopen	Sorry give me a second babe
	Won't I get you into trouble if I text you? I really don't want to do that (monkey covering eyes)
UC	Lol no
	I text all the time
SebasRPMopen	lol ok cool
	Can I tell you something babe?
	You are the first person who I've ever met online who I've trusted enough to share my number with (smiling emojis) (kiss emoji) (heart) (heart) (heart)
UC	Wow thank u
SebasRPMopen	Cool
	Are you alone?
UC	At the moment but I have family awake



SebasRPMopen	When I asked you if you're in a naughty mood I was asking because I wanted to know if you'd like me to share some videos with you?
	I love how secretly naughty you are you are amazing (smile emoji) (heart eye emoji) (heart eye emoji)
UC	Lol
	What do you have in mind for videos
SebasRPMopen	Well I get sent loads of vids... have you ever watched these kinda vids? (point up emoji)
	8a6dc011-7450-44c8-945b-5508ffbd0a71.mp4
	8d247117-0a07-48a7-bda9-b8352acd3cf6.mp4
	9cd6ea46-8594-4900-8fe5-2249a0deed5f.mp4
UC	Porn lol not really
SebasRPMopen	Yeah lol
	Are you into naughty vids like that? If you aren't you can just say...
	How old were you the first time you kissed a guy? How old was he?
UC	Umm probably 12 and he was 15
SebasRPMopen	You are so ssexy (heart eye emoji)
	So did you do everything with the 17 year old?
UC	Not sex but everything else

16. The above referenced files are more fully described below.

8a6dc011-7450-44c8-945b-5508ffbd0a71.mp4: is a 59 second video which depicts a post pubescent blonde female with red or white clothing across her belly and socks being vaginally copulated and performing oral sex on an adult male.

8d247117-0a07-48a7-bda9-b8352acd3cf6.mp4: is a 28 second video of a post pubescent blonde female being vaginally and anally copulated on a desk by an adult male.

9cd6ea46-8594-4900-8fe5-2249a0deed5f.mp4: is a 39 second video of a pubescent female being vaginally copulated on a bed, while laying on her back.

17. As my UC persona, I requested additional videos of the alleged victim and suspect to both have additional material to identify the alleged victim. It is imperative that law enforcement be able to locate her in order to determine whether the suspect had actually committed hands on sexual abuse of the alleged victim in addition to exploiting her online. In this portion of the conversation "sebasRPMopen" stated that the victim is from South Africa. In an earlier image where the female was posing with her top off, it appeared that the wall electrical outlets (and plugs in them) shown in the

background appeared to be North American-style outlets. To my understanding, wall electrical outlets in South Africa are generally different than this type of outlet depicted in the image, leading me to suspect that this child might be located and/or that the alleged crime(s) occurred with North America. The target also sent me an image of his erect penis in this exchange.

UC	Yea
	I'd like to see more of u guys doing stuff or just her
SebasRPMopen	Mmm So I have to tell you... I have never shared a pic of myself like that before but if you would like to see me when I'm throbbing hard I'll show you?
	But please promise me that you will keep the pic our little secret (kiss emoji) (monkey with hands over eyes emoji)
	018b7351-b51b-47d7-8070-5fa5132dcb8f.mp4
UC	Of course I will
SebasRPMopen	d477b186-a3c7-4ecc-aea3-fc328cdca31a.mp4
	e5647e90-df0f-4605-ba11-ad3a4dc10c92.mp4
	Can I maybe see more pics of you too my beautiful angel? (heart eye emoji) (heart eye emoji)
UC	<AI photo of mirror selfie in tank top>
SebasRPMopen	Darling you are the most beautiful girl I've ever seen in my life (heart eye emoji) (heart eye emoji)
UC	Do u have any of u and her together
SebasRPMopen	I don't I'm sorry babe I've actually never recorded myself with any girl before...
UC	Oh
SebasRPMopen	Have you ever?
UC	Did she send u those or did u tape them
	Yeah once
SebasRPMopen	So would you like to see me? (monkey face covering eyes)
UC	Yeah I'd like that
SebasRPMopen	No she sent me them to me when I was away to make my day
UC	Did u meet her on kik too?
SebasRPMopen	687e6254-7d5a-4ea-bfa8-911293858400.jpg
	TaDa that's me (smiling emoji) and I'm blushing now lol (monkey covering eyes)
UC	Wow
	Bigger than Luke for sure



SebasRPMopen	No babe I met her irl... I have never met anyone who I met online irl before...
	Have you?
	So I'm curious what did you make a video doing? (heart eye emoji)
UC	Haha just oral
SebasRPMopen	With Luke?
UC	She a US girl or a SA girl
	Yeah
SebasRPMopen	Were you going down on him? Or what were you doing in the video?
	She's a SA girl
	6f11dafc-98c1-41e5-b-3de35bc5ae7c.mp4
	eec3a977-8431-4658-945d-7c1a673ebba9.mp4
	0298f1d1-9355-4968-8ad0-50a68ac1fffc.mp4
	Do you still have the video my beautiful angel? (kiss emoji) (lips)
UC	Oh no it was on hus phone
SebasRPMopen	Was he the first guy to finger and go down on you too?
UC	Yea
SebasRPMopen	Mmm I'm so jealous of him (covering eyes monkey emoji)
	Was it good at least? Did he make you cum? (kiss emoji)
	Babe who is still awake? Or is everyone sleeping now?

18. The above referenced images, and videos are more fully described below:

018b7351-b51b-47d7-8070-5fa5132dcb8f.mp4: A 31 second video which shows a pubescent female bent over on her knees penetrating herself with a make up brush to masturbate. There is a blanket with snowflake patterns and plaid bedding on the bed.

d477b186-a3c7-4ecc-aea3-fc328cdca31a.mp4: A 57 second video which shows a pubescent female nude reclining on a blue blanket with her genitals prominently exposed. The female is manipulating her breast with her left hand while she uses her right hand to masturbate using a makeup brush. The female appears to have a black band bracelet on her right wrist.

e5647e90-dfof-4605-ba11-ad3a4dc10c92.mp4: A 54 second video which depicts a pubescent female reclining on her bed wearing a black sweatshirt, with her genitals exposed. The female uses a makeup brush to vaginally penetrate herself and masturbate.

687e6254-7d5a-4ea-bfa8-911293858400.jpg: An image of an adult penis being held by a right hand.

6f11dafc-98c1-41e5-b-3de35bc5ae7c.mp4: A 32 second video which depicts a pubescent female kneeling on a bed with plaid bedding, and a white or blue

pillow. The bed appears to be in a bunk bed. The female is wearing a black sweatshirt with a skull and cross bones, and says New York, and established 1678. The female has no pants, or underpants and inserts a makeup brush into her vagina and uses it to masturbate before turning off the camera.

eec3a977-8431-4658-945d-7c1a673ebba9.mp4: A 37 second video which depicts a pubescent female laying on what appears to be the top bunk of a bunk bed. There is a blanket which appears to have a snowflake pattern, and the female is lying on her stomach using the makeup brush to masturbate. The camera is on the bed pointed toward the girl's pubic area.

0298f1d1-9355-4968-8ado-50a68ac1fffc.mp4: A 42 second video which depicts the female "sebasRPMopen" identified as his ex-girlfriend (the alleged victim) laying nude on a bed holding the camera on her body. The female penetrates herself with a makeup brush and uses it to masturbate.

19. Since I had obtained material which the target had identified as CSAM, I asked about other materials that other minors had sent to him and asked to see what he had been sent. The target explained that he gets sent lots of videos, and that he doesn't even watch most of them, so he has "everything." I requested he send me some of his favorite videos and some "young" ones. I would note that my first impression of the media files sent below is that they were all child sex abuse material, but closer examination led me to conclude that this was not the case.

UC	Dunno
	Have you gotten other video and stuff from younger girls before
	Besides your ex
SebasRPMopen	Yeah babe I have vids that people have sent me
	Would you like to see those?
UC	Yeah
SebasRPMopen	Do you have a picture of you and Ashley?
UC	I'll look we aren't really close now I moved
SebasRPMopen	Babe how old do you like to see in vids?
UC	What do you have
SebasRPMopen	Babe I get sent loads of vids I don't even watch most of them so I have everything my love
	What do you like? No limits
UC	Umm show me your favorite and some young ones



SebasRPMopen	Do they turn you on my angel? (heart eye emoji)
UC	Dunno maybe
SebasRPMopen	Do you have any more pictures of you for me my beautiful angel? (smile emoji) (heart eye emoji) (heart eye emoji)
	<Adult Pornography>
	<Adult Pornography>
	<Possible CSAM>
	<Possible CSAM>
	F4440d0e-0bc9-4e35-8e70-1bfd2a745771.mp4
	<Possible Child Sex Doll>
	<Unable to Determine Age Pornography>
UC	<AI Photograph of UC in Hoodie>
SebasRPMopen	Omg baby girl I'm speechless... (heart) (heart) (heart)
UC	Thanks
	Where did you get all those
SebasRPMopen	You have the most amazing eyes (heart eye emoji)
	People I met on here and friends sent me them
	Baby what size bra do you wear?
UC	A lol why
	You going to mail me one
SebasRPMopen	(Heart eye emoji)
	So a little secret about me babe... I don't like big boobs they do nothing for me... so A B or C cup is perfect
	Mmm how about I do one better than that... when we meet I take you shopping for one? (kiss emoji)
	Are you a 32A?
UC	Ya

20. The video files referenced above consist of adult pornography, and apparent child sex abuse material. The only file described below will be those that appear to be in fact child abuse material.

F4440d0e-0bc9-4e35-8e70-1bfd2a745771.mp4: A 60 second video of what appears to be a 3–5-year-old on her back with a denim skirt pulled up being raped by an adult male. The video does not show the child's face, but the size of the child appears to be in that age range. The video then goes to the child on her stomach bent over while being raped by an adult male.

21. On February 15<sup>th</sup>, 2025, I submitted a Preservation Request on Medialab.ai Inc. requesting they preserve records relating to “sebasRPMopen” on their Kik platform.

22. While I was talking with “Sebastian” over the Kik messaging chat platform referenced, I gave him a phone number to reach the me. This phone number is maintained for use as an undercover officer, and I do not use it for any other purpose. I gave “Sebastian” my number at 7:39 PM on February 14<sup>th</sup>. At 7:50 PM, I mentioned to “Sebastian” that he hadn’t texted me back. At 7:53 PM “Sebastian” texted me back from (315)783-7603. I texted with him briefly on this via SMS messaging before returning to message with him on Kik.

23. I ran this number through the ICAC Data System and saw that it was referenced in two Cybertip reports that Meta, Inc. had submitted to National Center of Missing and Exploiting Children (NCMEC).<sup>1</sup> One of the reports was in reference to what Meta, Inc. believed was child pornography of a prepubescent child involved in a sex act per the file categorization submitted by the electronic service provider. I have not reviewed the file at this time as the tip was assigned to South African Police. I saw this tip originated from “Instagram” which is an application owned by Meta, Inc. The account name on the Cybertip report was Marcel Manfred MEYER with a verified phone number of (315)783-7603.

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<sup>1</sup> All electronic service providers, including parent companies like MediaLab.ai Inc. hosting social media applications, are required to notify NCMEC via the CyberTipLine whenever apparent CSAM or child exploitation material is detected on any of their accounts. NCMEC, in turn, will generate reports based on information provided by the electronic service provider, which are referred to as Cybertip reports.

24. I reviewed the second Cybertip report, and I learned it was from Facebook which is also owned by Meta, Inc. This report was in referenced to a file which was suspected to be a meme, which was sent to an account associated with a Marcell Manfred MEYER (DOB 04/01/1981). This account also had listed a phone number of (315)783-7603.

25. I, and other agents reviewed government records which showed that he had entered the United States in April of 2024 on a H2A (Agriculture) Visa. A known photograph of MEYER was located in these records, which appears to be the same male in the images “Sebastian” had provided me while communicating to me on Kik Messenger as “sebasRPMopen”.

26. On February 18<sup>th</sup>, 2025, when I returned to working in the UC persona described, I observed that I had received a message from a Kik user “ReedSebs” on February 16<sup>th</sup>, 2025. The message indicated that it was “Sebastian”, and that he had logged out of his old Kik account. I replied to him and when he didn’t answer I texted him on his provided phone number. “Sebastian” answered me shortly after stating he was working and would hopefully chat with me when he got out of work.

Sunday, February 16th, 2025	
ReedSebs	Hi Bri
	It's me Sebastian... I got logged out of my account
	How are you babe? Did you have a nice weekend?
	<GIF of Bunny Eating>
Tuesday, February 18th, 2025	
UC	Hey
	Yeah it was a good weekend! Went to grandma's and no phones allowed
	hi?
ReedSebs	Hey beautiful
	How are you?
	That's cool... who all went to grandmas house?
	Are you still there babe?
UC	Yup



	How are you?
ReedSebs	I'm exhausted babe... it's been a long day.

27. After speaking about general discussions, I requested additional videos. "Sebastian" provided me 5 videos of apparent adult pornography. I pointed out they were all adults, and he eventually sent additional videos of which two of the videos were apparent child pornography.

ReedSebs	I'm on the couch watching silent night but am going to jump in the shower quick and then make myself dinner... brb babe <kiss emoji>
UC	Hurry
	I want some more videos <Tongue out Emoji>
	Do u work this late every night
ReedSebs	Hey babe just got out the shower...
	Sure I can't remember what vids I've sent you... what vids would you like to see?
UC	I dunno show me some of ur favs
	U said u had lots haha
ReedSebs	lol I don't really have favs but I'll send you some that I've been sent recently...
	Who are you with babe?
UC	Just from people on Kik? Or friends u made
	Nobody but parents are walking around some why
ReedSebs	<Apparent Adult Pornography>
	<Apparent Adult Pornography>
	<Apparent Adult Pornography>
	<Apparent Adult Pornography>
	Yeah from friends and from people on kik... lol
	<Apparent Adult Pornography>
	Babe can I maybe see a live pic of you my angel.
UC	I don't know how I could so it my front camera is smashed, I can send my selfie tho
	Those are mostly grown ups huh
ReedSebs	You can send a live pic selfie my baby <kiss emoji>
UC	I tried it is messed up
Reedsebs	lol I'll looked for some younger ones for you xxx
UC	I mean just if u have them
	Don't go fishing for me haha
	I thought that's what u liked
ReedSebs	I'll look for you <kiss emoji> <lips>
UC	How many do u think u have?
ReedSebs	Babe tbh I am attracted to girls for who they are most of all age doesn't matter to me that's why I like you because I think you are an amazing beautiful person <heart> <heart> <heart>
UC	Oh I thought u said girls my age were more fun haha



ReedSebs	I really don't know how many I have people send me vids every day <tongue out emoji>
	Yeah girls my age are mostly boring <tongue out emoji> <monkey covering eyes emoji>
	218c4a5b-c271-4685-b6e9-b94474101ef8.mp4
	<Apparent Adult Pornography>
UC	<AI photograph of CI Persona in Pink Dress>
	I went to church and took a nice pic for u
ReedSebs	<Possibly Adult Pornography>
	07378cbf-e3ec-40c0-9eaf-cfc1c6ce0dfb.mp4
	Can I maybe see more pics of you baby? I lost all my pics with my other chat <sad emoji>
	<sad emoji>

218c4a5b-c271-4685-b6e9-b94474101ef8.mp4: Is a 1:04 minute video of a pubescent female performing oral sex on an adult male. The female appears to be 12-14 years of age.

07378cbf-e3ec-40c0-9eaf-cfc1c6ce0dfb.mp4: Is a 27 second video of a pubescent female performing oral sex on an adult male. The female appears to be 13-15 years of age.

28. On February 21<sup>st</sup>, 2025, I received messages from “Sebastian” on Kik while he was utilizing the username “ReedSebs”. “Sebastian” apologized for not being online and indicated he had been busy at work. “Sebastian” asked me if I was in a “naughty mood.” In response, when I indicated I was, he sent me the same apparent CSAM video of a blonde female performing oral sex that he had previously sent me on February 18<sup>th</sup>, 2025. “Sebastian” asked if I had any new photographs of me on my phone. He then sent me three videos, the first of which depicted a male having sex with a sex doll, and other two depicted a male having sex with women. “Sebastian” then offered to send me “naughty” ones that parents who he claimed to know had sent him depicting their little baby boy and girl.

ReedSebs	Do you have any new pictures of you on your phone?
	lol I have fantasized about us doing that... is that bad of me? <Monkey covering eyes emoji>
	<Possible Adult Pornography>
	<Apparent Video of Sex Doll>

	<Apparent Adult Pornography>
	Omg baby would you like to see some naughty ones a mom and daddy sent me with their little baby boy and girl?
UC	Yea
ReedSebs	But please promise me you will keep them our little secret k?
UC	I will
ReedSebs	c14d10c6-d7aa-4237-86db-149fd7537ab3.mp4
	61fb4b11-8b0c-465a-a092-58bfc94f270.mp4
	38f81cb7-0678-44fa-97d0-404f185c7e17.mp4
UC	Which one is the parents u know
Reedsebs	Babe I don't know any of these parents irl only met them on here
UC	Oh
	Do u think they really are the parents or just found it and pretending
ReedSebs	Do you have any friends who also chat on here?

c14d10c6-d7aa-4237-86db-149fd7537ab3.mp4: is a 12 second video file of what appears to be an adult male penetrating a prepubescent child vaginally. The child appears to be 2-3 years old.

61fb4b11-8b0c-465a-a092-58bfc94f270.mp4: is a 26 second video of an adult male holding a pre-pubescent female toddler with his erect penis between her legs. The male begins rubbing his penis on the child's genitals. The child appears to be 2-3 years old.

38f81cb7-0678-44fa-97d0-404f185c7e17.mp4: is a 57 second video of a post pubescent female performing oral sex on a 8-10 year old pre-pubescent male.

29. "Sebastian" explained over Kik messages that he has master's degrees in Business, and Psychology and that all fathers secretly want to sexually abuse their daughters, but they don't because they don't want their family torn apart. "Sebastian" assured me that he does not have any children, but he explained he has a niece in South Africa. "Sebastian" explained he is tempted to leave the bathroom door unlocked to have the child enter the bathroom behind him so the child can see and touch him. "Sebastian" asked me if he should leave the door unlocked, and I told him no.



ReedSebs	So I have a little niece and we are really close... and she is getting more and more curious like whenever I go pee she sneaks along to look at me... And whenever I'm in the shower she tries to come into the bathroom but I lock the door because I know if she comes in she will want to see and touch me...
	And whenever I'm in the shower she tries to come into the bathroom but I lock the door because I know if she comes in she will want to see and touch me...
	So the idea of being secretly naughty and leaving the door unlocked really turns me on but I'm not sure if I should do it...
	What do you think babe?
UC	I don't think so she wouldn't know what she was doing
	U see her in America or sa
ReedSebs	In SA
UC	Still that's not them deciding to be naughty that's a baby, just mho
	I know not fun butbu asked
ReedSebs	I did and I appreciate your honesty so much babe thank you
	So can I tell you what I think I would do if I was your daddy irl?

30. “Sebastian” asked whether I would prefer my father initiate sexual abuse on me either asking first or touching me while I slept. Eventually we discussed meeting in real life, and if I could come visit him sometime. I ended the conversation by saying I believed I was in trouble by my parents. Since that exchange, “Sebastian” has continued to contact me intermittently. As of February 26<sup>th</sup>, 2025, I have ended contact with “Sebastian”.

31. On February 22<sup>nd</sup>, 2025, I submitted a preservation request to Medialab.ai Inc for records relating to the Kik account “ReedSebs”.

32. On February 25<sup>th</sup>, 2025, while attempting to locate additional information on MEYER and his accounts, I searched within the ICAC database for Cybertips relating to the username “sebasRPMopen” and found one had been filed by MediaLab.ai on February 16<sup>th</sup>, 2025, during which 48 reported files had been uploaded to Kik. The suspect username on the account was “sebasrpmopen”. The cybertip showed a “referred email address” of 04pillar.garble@icloud.com.

33. I searched for Cybertips relating to an email address of o4pillar.garble@icloud.com and found that there was 19 Cybertip results for regarding Cybertip reports for Kik accounts reported by MediaLab associated with this email address, specifically the following Cybertip report numbers:

196293220	196930488	197537371
198010036	198581053	199099321
201634134	202044199	202509221
202938221	203429579	204332537
204860256	205408062	205937963
206164152	206801241	206337627
	203856877	

34. I have reviewed the reports that are available to me (206801241 was locked, and I am unable to access it at this time. This report is associated with the Kik username “reedsebs”). I saw the referenced usernames, and number of apparent child pornography as reported by the electronic service provider.



<u>CyberTip Report Number</u>	<u>Username</u>	<u>ESP User ID</u>	<u>Number of Files of Suspected Child Pornography Reported</u>	<u>Date(s) File(s) Uploaded per Time/Date Stamps in UTC</u>
196293220	<i>Sebsopen</i>	<i>Sebsopen_jgo</i>	16	06-13-2024; 06-27-2024; 06-30-2024; 07-02-2024; 07-06-2024
198010036	<i>sbtnrds</i>	<i>Sbtnrds_8na</i>	26	08-12-2024; 08-18-2024; 08-19-2024; 08-20-2024; 08-22-2024;
201634134	<i>sebsreeds</i>	<i>Sebsreeds_ycg</i>	11	10-05-2024; 10-10-2024; 10-14-2024; 10-16-2024; 10-20-2024; 10-23-2024; 10-25-2024
202938221	<i>sebastianreeed</i>	<i>Sebastianreeed_kvh</i>	24	11-22-2024; 11-23-2024; 11-24-2024;

				11-27-2024; 11-29-2024
204860256	<b>sebsnew</b>	<b>sebsnew_ezu</b>	10	01-11-2025; 01-12-2025; 01-13-2025; 01-14-2025;
206164152	<u>sebsnew (Chat about exploitation with other Kik users)</u> <sup>2</sup>	<b>sebsnew_ezu</b>	0	The chat thread is dated 02-12-2025.
196930488	<b>sebastianrds</b>	<b>sebastianrds_x4i</b>	21	07-12-2024; 07-13-2024; 07-22-2024; 07-24-2024; 07-25-2024;
198581053	<b>sebsopen4</b>	<b>sebsopen4_p4k</b>	21	08-31-2024; 09-02-2024;
202044199	<b>sebsrreed</b>	<b>sebsrreed_iid</b>	17	

<sup>2</sup> Per the Cybertip Report 206164152, in the section entitled "Chat Logs" reported the following information

				10-27-2024; 10-28-2024; 10-30-2024; 10-31-2024; 11-02-2024; 11-03-2024; 11-06-2024;
203429579	<i>sebropen</i>	<i>sebropen_7tv</i>	31	11-30-2024; 12-01-2024; 12-05-2024; 12-08-2024; 12-09-2024;
205408062	<i>sebrpmopen</i>	<i>sebrpmopen_c7v</i>	50	01-16-2025; 01-18-2025; 01-20-2025; 01-25-2025; 01-26-2025; 01-27-2025
206801241	<i>reedsebs</i>		Unavailable	
203856877	<i>sebsropen</i>	<i>sebsropen_vck</i>	18	12-12-2024; 12-15-2024; 12-17-2024; 12-20-2024; 12-22-2024
197537371	<i>sbtnreed</i>	<i>sbtnreed_z6u</i>	21	08-02-2024; 08-04-2024; 08-05-2024; 08-09-2024;
199099321	(Same as 197537371)		0	



202509221	<b>sebsjreed</b>	<b>sebsjreed_95c</b>	23	11-08-2024; 11-11-2024; 11-12-2024; 11-14-2024; 11-18-2024
204332537	<b>sebropenpm</b>	<b>sebropenpm_xfr</b>	21	12-26-2024; 12-29-2024; 01-01-2025
205937963	<b>sebsrpmopen</b>	<b>sebsrpmopen_jku</b>	39	01-30-2025; 02-01-2025; 02-03-2025; 02-07-2025;
206337627	<b>sebasrpmopen</b>	<b>sebasrpmopen_0oz</b>	47	02-08-2025; 02-09-2025; 02-11-2025; 02-14-2025; 02-15-2025;

35. I have not viewed any of the visual imagery associated with each of the afore-mentioned Cybertips. However, MediaLab.ai Inc. identified a total 396 video files of apparent child pornography, 5 of which were identified by the electronic service provider as depicting infants or toddlers. Each of these hundreds of video files that resulted in these Cybertips involved the sharing by the user with the multitude of Kik accounts linked to the email address [o4pillar.garble@icloud.com](mailto:o4pillar.garble@icloud.com) to other Kik users via private chat message. All of the usernames for these Cybertips appear to be derivative of the name “Sebastian,” the name that the suspect claimed to be his when he communicated with me as the UC 13-year-old female persona.

36. As noted in the above-chart, Cybertip report 206164152 did not pertain to imagery uploaded but rather a concerning chat text thread between multiple Kik users,

including the account identified by screen/username of “sebsnew” and ESP User ID “sebsnew\_ezu.” The following summary of the chat was provided by MediaLab to NCMEC and documented in the Cybertip Report:

*In thread, “brian7545\_wmp:girldad1998\_oyh,” the reported suspect claims to have a 9 year old and a 14 year old daughter, as well as a 4 year old niece, and user “brian7545\_wmp” claims to have three children, ages 4, 8, and 16. In this chat, the reported suspect seems to describe being sexually attracted to his niece. In thread, “girldad1998\_oyh:imbored 8903\_ee80”, the reported suspect claims that his oldest daughter was actually his niece, who he claims to have adopted during the covid pandemic.*

*In thread, “girldad1998\_oyh:hrnydevil\_20cm\_bn8”, the reported suspect describes molesting his niece.*

*In thread, “girldad1998\_oyh: **sebsnew\_ezu**”, the reported suspect describes his relationship with his 2 daughters and niece. User “**sebsnew\_ezu**” appears to give the reported suspect advice on how to start sexually abusing his 9 year old daughter, and this user describes the sexual relationship he had with his 9 year old sister when he was 12, presumably as an example for the reported suspect to follow.*

*In thread, “girldad1998\_oyh:stroker132\_ljf”, the reported suspect shares an image (888829da\_5003-4585-8898-1d2d76a2bcd) depicting a nude pubescent female child. The suspect claims he found this image of his alleged daughter on her phone and sent it to himself.*

*In thread, “girldad1998\_oyh:tippy19683\_xtk”, the reported suspect and user “tippy19683\_xtk” discuss being sexually attracted to their daughters/niece, and user “tippy19683\_xtk” claims to be sexually active with both of his daughters.”*

37. I know from previous investigations that after electronic service providers report contraband to NCMEC via the CyberTipLine resulting in CyberTip reports, generally, simultaneously or concurrent with the CyberTip submission, the company will also close the suspect account for violation of user guidelines. I have reason to

believe that MediaLab did so regarding all of these accounts that resulted in the CyberTips. Based on the CyberTip reports, it appears likely that the same individual created at least seventeen Kik messaging accounts from the period from at least June 13, 2024, through and until February 15, 2025. This same suspect utilized these accounts as instrumentalities to distribute CSAM video files, some involving infants and toddlers to other. By creating new accounts shortly after having former accounts closed for violation of community standards, that this same individual with the email address o4pillar.garble@icloud.com continued to disseminate contraband and not be deterred. This behavior is consistent with how merely two days after my initial UC communications with the first suspect Kik account “sebasRPMopen,” “Sebastian” messaged me on a second Kik account “ReedSebs,” claiming to have gotten logged out of the “sebasRPMopen” account. Again, this individual consistently remains undeterred and committed to his ongoing distribution activity, sexual predation of children online, and discussions of hands-on activity with minors further illuminated by the context of the chats reported in Cybertip report 206164152.

38. On February 26<sup>th</sup>, 2025, I requested that MediaLab preserve all of the aforementioned additional identified Kik usernames associated with the nineteen cyber tips which are believed to be associated with Marcell Manfred MEYER.

39. On February 26<sup>th</sup>, 2025, I received another message from “Sebastian” which indicated he got logged out of his account and lost his chats again. The new username he was using was “SReed1214”. He did not send any CSAM to me using this account. I have since stopped interacting with “Sebastian”.

40. *United States V. Brunette*, 256 F.3d 14 (1<sup>st</sup> Cir. 2001), states that an image of child pornography, if available, should be attached to the affidavit so that the



reviewing judge may make an independent determination of probable cause with respect to whether the image is sexually explicit. Accordingly, I have attached as “Attachment C”, and would hereby incorporate herein, the screen capture from video files c14d10c6-d7aa-4237-86db-149fd7537ab3.mp4, 61fb4b11-8b0c-465a-a092-58bfc94f270.mp4, and d477b186-a3c7-4ecc-aea3-fc328cdca31a.mp4.

41. The search warrant results will provide information to help provide further evidence to determine the identity of the user(s) of the **Target Accounts**, as well as provide context and scope of these accounts. The content stored within these accounts will likely contain visual depictions of minors engaged in sexually explicit conduct and further conversations with purported minors and/or with other likeminded individuals discussing past, present or desired exploitation of children online and/or in person. This information will also be used to identify sources of where he obtains CSAM, and potentially the other persons who had also purported to be sexually abusing children.

**RELEVANT INFORMATION REGARDING PERSONS INVOLVED IN THE  
POSSESSION AND DISTRIBUTION OF CHILD PORNOGRAPHY AND  
ONLINE CHILD ENTICEMENT**

42. Based upon my training and experience in child sexual exploitation and CSAM investigations as well as through conversations with other officers with knowledge and experience with these types of investigations, your Affiant knows the following:

a. Those who have possessed and/or disseminated CSAM or child sexual exploitation material and/or disseminated obscene material to purported minors have an interest or preference in the sexual activity of children. Persons who are involved

with CSAM generally have other sexually explicit materials on additional accounts and/or digital media related to their interest in children, which may consist of photographs, motion pictures, videos, text material, computer graphics and digital or other images for their own sexual gratification. This often includes what may be termed as child erotica or child exploitation material, which may consist of images such as minors in lingerie or text writing involving sex with minors that do not rise to the level of CSAM, but nonetheless fuel their deviant sexual fantasies involving minors. I am aware that this sort of material has been admitted in trials under Fed.R.Evid. 404(b) to prove such things as the possessor's knowledge, intent, motive, and identity to prove the person has a sexual interest in minors. I understand that they may upload or import (meaning transfer) this illicit imagery onto multiple digital media devices and/or accounts so they can access such material readily to satisfy their prurient desires.

b. Individuals who collect CSAM often seek out like-minded individuals, either in person or on the Internet, to share information and trade depictions of CSAM and child erotica. This includes joining Kik groups that gear towards their interest. They do this to gain status, trust, acceptance, and support and to increase their collection of CSAM and child erotica. The different Internet-based vehicles used by such individuals to communicate with each other include, but are not limited to, peer-to-peer (P2P) chat and file sharing programs, e-mail, e-mail groups, bulletin boards, Internet Relay Chat (IRC), newsgroups, Internet clubs, and various forms of Instant Messaging such as WhatsApp, Facebook Messenger, Yahoo Messaging, Telegram, and Kik that is sometimes saved on the users' computer or other digital storage media. They may upload files from their CSAM and child erotica collections onto multiple social media accounts where they communicate with others sharing their interests.



c. Besides CSAM and child erotica, such individuals often produce and/or collect other written material about sexual activities with minors, which range from fantasy stories to medical, sociological, and psychological writings, which they save to understand and justify their illicit behavior and desires.

d. Individuals who collect CSAM often collect, read, copy, and/or maintain names, addresses, including e-mail addresses, phone numbers, and lists of persons who have advertised or otherwise made known in publications and on the Internet that they have similar sexual interests, or have CSAM and child erotica for sale or trade. These contacts are maintained for personal referral, exchange or, sometimes, commercial profit. They may maintain these names on computer storage devices, web sites or other Internet addresses. Their discovery can serve as leads to assist law enforcement in proving the instant case and in apprehending others involved in the underground trafficking of CSAM as well as identifying the origin of the images or videos to assist with locating the child victims depicted in the imagery.

e. Collectors and distributors of CSAM may also receive sexual gratification, stimulation and satisfaction from contact with children, both in person as well as online, including online UC personas who represent themselves to be minors.

f. Individuals who seek inappropriate relations with children online often collect and/or distribute CSAM. They may send these materials as well as sending other obscene material, including of their own genitalia, to the target child victims. They do so in order lower the inhibitions of children that they are attempting to seduce, to arouse the targeted children, or to demonstrate the desired sexual acts. While communicating with children online, these individuals could use that imagery as well as other manipulative behaviors, which is commonly referred to “grooming.” Grooming

techniques may include attempts to entice the child into sending sexually explicit images or videos. The goal of some of these online offenders is to meet with the child in real life to engage in hands on sexual offenses.

g. Individuals who collect CSAM rarely, if ever, dispose of their sexually explicit materials and may go to great lengths to conceal and protect from discovery, theft, and damage, their collections of illicit materials. Because of their desire to retain child pornography together with the sense of security afforded by using digital media devices and accounts, the collectors will often retain these CSAM and child exploitation imagery for lengthy period of time, or even sometimes indefinitely. These individuals usually maintain their collections of sexually explicit materials in the privacy of their own homes and possessions. These individuals may protect their illicit materials from discovery by other through use of passwords, and encryption, and other security measures, including on third party image storage sites via the Internet.

h. In some instances, these depictions are actual photographs or images of the suspect's own sexual activity with past or present child victims. This imagery serves as archives of hands-on offenses and/or CSAM that they enticed real children to produce, which tends to be extremely important to these individuals. Such individuals may keep such depictions as means of plying, broaching or titillating the sexual interests of new or prospective child victims. They may also retain them for lengthy periods of time for their own personal arousal. These offenders are less likely to destroy CSAM or child erotica from child victims known to them.

### **BACKGROUND ON KIK MESSENGER**

43. Kik, which is owned by the holding company MediaLab.ai Inc. advertises itself as “the first smartphone messenger with a built-in browser.” The application Kik is also referred to as Kik Messenger. Kik Messenger allows users to “talk to your friends and browse and share any web site with your friends on Kik.” According to their website, Kik Messenger, a free service easily downloaded from the Internet, has become the simplest, fastest, most life-like chat experience you can get on a smartphone. The Kik app is available for download via the App Store for most iOS devices such as iPhones and iPads and is available on the Google Play Store for Android devices. Kik can be used on multiple mobile devices, which include cellular phones and tablets.

44. Kik accounts are identified by their usernames or display names whereas other messaging applications like WhatsApp and Signal are identified by the phone number of the mobile device where the application is installed. Kik users are in complete control of what personal information is shared with whom they communicate, because MediaLab does not make their phone numbers and other subscriber information apart from display names publicly accessible. On Kik, a user can have both a username and a separate display name for the same account.

45. At the time of the account registration, a “username” for the account is created. This username, which consists of letters, numbers, periods and underscores is unique to the account and cannot be changed. No one else can utilize the same username. A Kik user would have to create a new account to obtain a different username. A Kik user can also have a separate display name for the same account or use the same username and display name of the same account. Display names are what



other Kik users see in their Chat list, at the top of an individual private messaging with another user and in the “group info” screen in a group chat. Display names, unlike usernames, can be changed at any time without creating a new account and can include a variety of letters, numbers, characters and emojis. With regard to the two suspect Kik accounts that I communicated with as a UC with “Sebastian,” they each appear to have the same username as well as display name. The ESP ID is an identifier created by MediaLab that is not necessarily visible on the platform chats to other users. It is a derivative of the username, generally the same as the username with an underscore and a couple additional letters or numbers. I understand that MediaLab can identify user accounts by either username, display name or by ESP ID, and that responsive data to legal process will contain that information.

46. In general, providers like MediaLab ask their subscribers to provide certain personal identifying information when registering for an account. This information can include the subscriber’s full name, physical address, and other identifiers such as an e-mail address. However, MediaLab does not verify that information. MediaLab also retains certain transactional information about the creation and use of each account on their systems, including the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account, and other log files that reflect usage of the account.

47. On this messaging social media platform, akin to text messages, Kik users can exchange text, images, videos, and stickers with other users. They can also live stream. Kik permits users to communicate one-on-one with another user via a private

message as well as through group chats. Kik hosts public and private groups which facilitate group chat with multiple users. Any Kik user can search for Public Groups by tapping a blue + icon, and selecting “public groups,” then searching for a particular topic in the search bar or exploring groups under “Popular searches.” Once a user joins a group, he or she can chat with the other members. A Private Group require a user to scan a particular group’s “Kik Code” or being invited or clicking a direct link for a Kik user to join. These Kik groups are similar to “servers” on Discord or “groups” on Telegram or the former “chat rooms” hosted by America Online (AOL).

48. Given the ability for users to create multiple accounts that are not linked to a specific mobile device (i.e. a phone number), it has become a popular app used by people involved in the collection, receipt, and distribution of CSAM. These individuals will frequently join groups whose topic appeals to their deviant interests. They can trade their material in the group chat and/or discuss topics of interest. Individual group members may have side “private chat” via private messaging on the Kik platform either in lieu of or simultaneously while chatting in the Group.

49. I understand that MediaLab will retain subscriber data for user accounts. According to MediaLab’s law enforcement website, “basic subscriber data” retained by MediaLab that can be provided pursuant to legal process includes the following:

- a. Account registration information: first and last name as well as email address at the time of account creation.
- b. The most current profile picture and/or background photo unless the user’s account has been deactivated.
- c. Device related information.
- d. Account creation date.

- e. Kik version.
- f. Birthdate (if available).
- g. User location information, including 30 days of logs of IP address(es).

50. I further understand that MediaLab retains content data for individual user accounts, Groups, as well for a specific media file sent on Kik. Content user data for an individual account includes the following:

- a. Transactional Chat Log for all messages that a user has sent and received including the sender and recipient username or receiver group identification information, timestamps, and the IP address of the sender.
- b. Chat Platform Log of all the media files that a user has sent and received including sender username, recipient username or receiver group identification information, timestamps, IP address of the sender and the content ID of the media.
- c. All media files (photographs and video files) sent or received by the user over the last 30 days).
- d. Log of all usernames added or blocked by the user including timestamps.
- e. Any abuse reports by the company against the user, including a transcript of chat history against the subject user, including sender username, recipient username, timestamps, actual message, and content IDs.
- f. Logs of all email addresses associated with a username.

Content Group Data retained by MediaLab includes the following: a record of all users who have joined the group or who have left the record; the group name; group type; logs of all messages that a group has received including sender username, timestamps, IP address of the sender; logs of media files identified by their content ID that the group



has received, including sender username, timestamps, IPs of the sender, receiver usernames, and media type; media files received by the group; and group abuse reports. Content ID data includes a record of the first time a specific media file was sent on Kik, including the timestamp, sender username, IP address of the sender, the username or group name of the recipient and the media source.

51. After a user account is closed, he or she could create another account, even using the same email address associated with the previous account as well as accessing the same IP address. I understand based on direct email communications with a representative from MediaLab that the company can check for re-used email addresses and IP addresses.

#### **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

52. Your Affiant anticipates executing this warrant under the Electronic Communications Privacy Act, pursuant to 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require MediaLab.ai Inc. to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

#### **CONCLUSION**

53. Based on the foregoing, your Affiant requests that the Court issue the proposed search warrant.

54. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute


this warrant by serving it on MediaLab.ai Inc. through their online law enforcement portal. Because the warrant will be served on MediaLab.ai Inc, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

55. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711, 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated; 18 U.S.C. §§ 2252A(a)(2).

**REQUEST FOR SEALING**

56. Your Affiant further requests that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to the target and potential additional targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.



Respectfully submitted,

  
Joshua S. King  
Task Force Officer  
Homeland Security Investigations

Sworn to telephonically and signed  
electronically in accordance with the  
requirements of Rule 4.1 of the Federal Rules  
of Criminal Procedures

Date: Mar 04 2025

City and state: Portland, Maine

  
  
Judge's signature  
Karen Frink Wolf, U.S. Magistrate Judge  
Printed name and title